

Mackil, Molly J. (DNREC)

From: Defriece John R. (DNREC)
Sent: Thursday, October 14, 2010 9:03 AM
To: 'Gary Lasako'
Cc: Mann Stephen M. (DNREC); Krumrine Beth L. (DNREC)
Subject: RE: AL-130-18; Harbeson; DE 0000299

Gary,

You would need a Form 2F for a stormwater discharge for an individual permittee like Allen's.

DNREC Home Page: <http://www.wr.dnrec.delaware.gov/Pages/Default.aspx>

Water Division Home Page: <http://www.wr.dnrec.delaware.gov/Pages/Default.aspx>

Surface Water Discharges

Section: <http://www.wr.dnrec.delaware.gov/Services/Pages/SurfaceWaterDischarges.aspx>

Forms: <http://www.wr.dnrec.delaware.gov/Services/Pages/SurfaceWaterDischarges.aspx>

Form 2F: <http://www.epa.gov/npdes/pubs/3510-2F.pdf>

However, regulations do allow you to sample a stormwater outfall as "substantially identical to and representative of" another stormwater Outfall.

Delaware [Regulations Governing The Control Of Water Pollution](#)

"9.1.4.2.4 Representative Discharge

If any person subject to this Part reasonably believes that two or more outfalls discharge storm water substantially identical (based on consideration of industrial activity, Industrial Materials, management practices and activities within the area drained by the outfalls) that person may test the discharges of one of such outfalls and report that the quantitative data also applies to the substantially identical outfall(s)."

Usually, if there are multiple stormwater outfalls, we would ask you at least sample the most contaminated one. If that one is ok, then the other SW outfalls should be too. If one is especially bad, it's best to just sample that one separately, and use some other SW outfall to represent the remaining SW outfalls. Note that federal regs. consider run-off from live animal holding areas as more like "process water" than "industrial stormwater", so you cannot use "live holding area" as representative of other "stormwater only" outfalls.

We don't ask for the other things you mentioned. We would ask for a construction permit application if the permittee was constructing changes in their wastewater system (collection, transmission, and treatment), unless the changes were trivial or "replacement in kind".

John

From: Gary Lasako [mailto:gklasako@bpenvironmental.net]
Sent: Thursday, October 14, 2010 8:06 AM
To: Defriece John R. (DNREC)
Subject: AL-130-18; Harbeson; DE 0000299

John,

As Allen's nears the completion of their NPDES Renewal Application for Harbeson, a few additional questions have been raised.

- 1) Discharge from Outfall 004 is composed of runoff generated from access driveways and the employee parking area; as such, it is composed entirely of non-process related storm water. This Outfall appears to have been added to the NPDES permit during the most recent renewal completed in May 2006. At that time DNREC imposed standard minimum requirements for this stormwater, "The discharge shall be free from floating solids, sludge deposits, debris, oil and scum." As Outfall 004 discharges only non-process related storm water, and because no sampling requirements are required in the current NPDES permit, no sampling is required for the completion of EPA Form 2C for this Outfall. Correct?
- 2) Besides EPA Form 1 and EPA Form 2C, are there any other forms and/or documentation that Allen's needs to complete for the permit renewal to be considered administratively complete? The most recent NPDES renewal we assisted with in Maryland required the completion of an NOI and a "Treatment Plant Classification," and the submission of workmen's compensation information. Does DNREC require any similar documents for the renewal? If so, can you direct us toward those forms?

Once again, thank you for your guidance and assistance.

Best Regards,

Gary Lasako
Field Scientist
BP Environmental, Inc.
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From: Gary Lasako [mailto:gklasako@bpenvironmental.net]
Sent: Friday, October 08, 2010 7:55 AM
To: 'john.defriece@state.de.us'
Cc: 'Lou Ann Parson'
Subject: AL-130-18; Harbeson NPDES renewal

John,

It was nice speaking with you yesterday afternoon. As I stated, BP Environmental, Inc. is assisting Allen's in completing the NPDES Renewal Application for Harbeson. Per our conversation, we will obtain all the required data to complete EPA Form 2C – Item V for Outfall 001. For Outfalls 002 and 003, there has been no recordable discharge from these outfalls in the last three years, and this will be noted in the application.

Feel free to contact me, if needed.

Best Regards,

Gary Lasako
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